

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS GREG WHITEMAN
(APWU/USPS-T12-14-19)
(February 24, 2012)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness Greg Whiteman (USPS-T-12). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

Darryl J. Anderson
Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T12-14 In the market research, consumers and commercial accounts all said they “would easily adapt “to the proposed changes to the First-Class Mail service standards. How much of the total losses in First-Class Mail volume for the past three years is attributable to conversion to Internet-based services?

APWU/USPS-T12-15 For the IDI research, the interviewees are noted to be “National” and “Premier” accounts. What is customer profile for each of these accounts?

APWU/USPS-T12-16 Basic service “current performance” is described as “highly satisfactory.” How is “highly satisfactory” defined?

APWU/USPS-T12-17 On page 5 of your testimony you noted that “many [interviewees] said that the Postal Service was too important to them to risk not supporting steps needed to ensure that it continues to operate.” Given this, how do you explain the reluctance of customers to pay more for the services?

APWU/USPS-T12-18 Has research been conducted in the past 5 years by, or on behalf of, the USPS regarding the relative importance of various service features and service standards to customers? If so, please provide results by service class and for each non-competitive parcel subcategory as well as for Express Mail and Priority Mail. If possible, provide results in total and by customer segment. If such research exists but does not allow for results by class, sub-category or segment, please provide the results as tabulated.

APWU/USPS-T12-19 In your testimony for this case you estimate that the service standard changes will cause a revenue loss of \$1.3 billion and a loss of \$0.5 billion in contribution. In your testimony for N2010-1 (Revised Direct Testimony of Gregory Whiteman on Behalf of the United States Postal Service, T-9, July 15, 2010) you estimated revenue losses of \$465.9 million and a loss of \$206.1 million in contribution resulting from a change from 6-day to 5-day delivery.

- a) Even though you did not do any market research on the combined impacts of these two programs (See Response to NALC/USPS-T12-14, filed January 31, 2012), have you, as a Postal Service manager, had to make estimates of the combined impacts of these two initiatives for planning purposes?
- b) If so, is your working assumption that revenue losses resulting from both of these programs enacted together would be \$1.77 billion with a loss of contribution of \$0.7 billion? If not, please provide your estimate of combined revenue and contribution losses.
- c) If you have not had to make such estimates for planning purposes, please provide the title of the Postal Service manager who is making such estimates.